

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

UNITED STATES OF AMERICA)
)
v.)
)
CHESTER GALLAGHER; HEATHER IDONI;) NO. 3:22-CR-00327
CALVIN ZASTROW; COLEMAN BOYD;) JUDGE TRAUGER
PAUL VAUGHN; DENNIS GREEN)
)
)

DECLARATION OF [REDACTED]

I, [REDACTED], declare as follows:

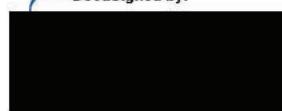
1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.
2. In March 2021, I was employed at the Mount Juliet, Tennessee carafem location.
3. When I arrived at the carafem clinic on March 5, 2021, I saw dozens of people, some of whom were later named as the Defendants in this case, standing in the hallway and blocking the entrances. I felt afraid for my safety that day.
4. I was also working at the Mount Juliet carafem location on July 26, 2022 when an Operation Save America (“OSA”) blockade caused the clinic to go into lockdown. After this incident, I began to change my routes to and from home, and I paid close attention to cars around me on the interstate and in my apartment parking lot due to fear that OSA members would follow me.
5. These two incidents at carafem have caused me anxiety and have made me fear for my personal safety. I have also sought medical treatment due to these incidents.
6. The knowledge that extremists may learn my identity and other personal information, including my home address during the trial of this case is terrifying.

7. In early 2021, I was “doxed” on LiveAction, an anti-abortion website. The website identified me as an individual who had previously worked at another reproductive health organization and posted my name and links to my LinkedIn and Facebook profiles. The publication of my information on an anti-abortion website scared me because it seemed to encourage anti-abortion extremists to find and harass or otherwise harm me.

8. I am concerned that if I am publicly disclosed as a testifying witness in this criminal trial, Defendants’ supporters and other anti-abortion extremists will use my personally identifying information to harass and threaten me. I fear for my personal safety if I have to testify in open court without using a pseudonym.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 and penalty of perjury.

Dated: January 8, 2024

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